

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GARDEN CITY BOXING CLUB, INC.

Plaintiff

Index#: CV 07-08082

-against-

PUPUSERIA RANCHITO RESTAURANT, INC.  
d/b/a PUPUSERIA RANCHITO  
and JUAN A. LOZANO

**PLAINTIFF'S INITIAL  
DISCLOSURE PURSUANT TO  
FED R.CIV.P.26(a)(1)  
OF INTERROGATORIES**

Defendant

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Pursuant to the requirement of Federal Rule of Civil  
Procedure 26, Garden City Boxing Club, Inc. Plaintiff in the  
above-titled action, makes the following disclosures by and  
through its undersigned counsel:

1. Initial Disclosures

(A) The identity of each individual likely to have  
discoverable information relevant to disputed facts alleged with  
particularity in the Complaint is as follows:

(1) Garden City Boxing Club, Inc. c/o Thomas P. Riley,  
P.C., First Library Square, 1114 Fremont Avenue, South Pasadena,  
CA 91030-3227; having knowledge as to the unauthorized  
publication and use of the telecast of Oscar De La Hoya and  
Bernard Hopkins on September 18, 2004 at the Pupuseria Ranchito  
Restaurant Inc.

(2) Pupuseria Ranchito Restaurant d/b/a Pupuseria  
Ranchito and Juan A. Lozano ("Defendant"), 4129 Broadway, New

York, NY 10033; knowledge as to the information contained in and relating to the unauthorized publication and use of the telecast of Oscar De La Hoya and Bernard Hopkins on September 18, 2004 at the Pupuseria Ranchito Restaurant, Inc..

(B) All documents, data compilations, and tangible things that are in possession, custody, or control of J&J Sports Productions, Inc., may use to support its claims and/or defenses include the following:

- (1) Copy of investigators report;
- (2) Responses to discovery;
- (3) Deposition testimony, if any;
- (4) any other relevant document not yet discovered by Plaintiff which would be relevant to Plaintiff's case.

The documents are located or will be located at the offices of Thomas P. Riley, PC, First Library Square, 1114 Fremont Avenue, South Pasadena, CA 91030-3227 and Paul J. Hooten & Associates, PLLC, 5505 Nesconset Hwy., Suite 203, Mt. Sinai, New York 11766/ There may e other documents that may be relevant that are not yet known which may be used to support the claims and/or defenses of Garden City Boxing Club, Inc..

( C ) Damages to Plaintiff arising from the Defendant's authorized use of the telecast of Oscar De La Hoya and Bernard Hopkins on September 18, 2004 at the Pupuseria Ranchito Restaurant Inc. d/b/a Pupuseria Ranchito and Juan A. Lozano and

attorney fees and costs.

(D) Fed.R.Civ. P. 26 (a) (1) (D) does not apply to this matter.

Date: July 17, 2008

Respectfully submitted,

/s/ Paul J. Hooten  
PAUL J. HOOTEN & ASSOCIATES  
ATTORNEY FOR PLAINTIFF  
5505 Nesconset Hwy., Suite 203  
Mt. Sinai, New York 11766  
(631) 331-0547

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Defendants,

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**CERTIFICATE OF SERVICE**

I certify that a copy of the Plaintiff's Initial Disclosure Pursuant To Fed R.Civ.P 26(a)(1)  
Of Interrogatories was sent via the U.S. Postal Service within the State of New York, First Class  
Mail addressed to the following on July 17, 2008:

To: Enrique A. Leal, Esquire  
Attorney for Defendant  
270 North Avenue  
Suite 711  
New Rochelle, NY 10801

By: /s/ Lucille Eichler  
Lucille Eichler  
Paul J. Hooten & Associates  
5505 Nesconset Highway, Suite 203  
Mt. Sinai, NY 11766